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July 1, 2020

Paul Kjellander, President Idaho Public Utilities Commission P.O. Box 83720 Boise, ID 83720

RE: Second Request for a Public Hearing on Avista's 2020 Electric Integrated Resource Plan, Case No. AVU-E-19-01

President Kjellander and Commissioners of the Idaho Public Utilities Commission:

The Idaho Conservation League (ICL) respectfully requests the Idaho Public Utilities Commission (IPUC) order a virtual public hearing be held on the matter of Avista's 2020 Electric Integrated Resource Plan (IRP).

On May 13, 2020, the IPUC issued a notice of modified procedure in Order Number 34666, directing persons desiring a hearing to specifically request a hearing in written comments. Prior to the IPUC's issuance of Order Number 34666, the Idaho Conservation League, Idaho Forest Group, the City of Sandpoint, and several small business owners in Sandpoint had already submitted written comments specifically requesting that a public hearing be held on this matter, all of which contained statements of reasons supporting the request for a hearing, including that:

- Local governments and their communities are interested in directly communicating their interests and vision for how Avista approaches the rapidly changing electric utility landscape;
- Businesses are aware of the dramatic changes underway in the electric utility industry and want to ensure steady electric rates and reduced financial risk;
- Avista electric customers in rural North Idaho communities want an opportunity to communicate directly with the IPUC and Avista in the same way that electric customers in Boise and Spokane more often have the opportunity to do;
- Newcomers to North Idaho and Avista's electric service are interested to communicate directly with the company that provides their only source of electricity and want to convey why they feel strongly about where that electricity comes from; and

• An increasing number of Avista customers in Idaho continue to participate in the IRP process via public hearing opportunities.

Based on these reasons the IPUC should hold a public hearing on Avista's IRP, but because the State of Idaho continues to face challenges related to COVID-19, ICL requests the IPUC hold a virtual (i.e. live-streamed on Zoom or Webex) public hearing rather than an inperson public hearing. Not only would a virtual public hearing reduce the public's potential exposure to COVID-19, it would allow Avista customers from across the Idaho Panhandle to participate in the public process instead of limiting the hearing to one particular community.

Facilitating a virtual public hearing takes time to coordinate and organize, which is why ICL is also requesting the IPUC issue an order, at its earliest convenience, directing the IPUC Staff to begin the process of coordinating it. According to the IPUC Order No. 34666, Avista's reply comment deadline in this case is September 2, 2020. If the IPUC grants a virtual public hearing on this matter, presumably Avista would like an opportunity to reply to any comments made during that hearing. This means a virtual public hearing would need to be set for a date before September 2, 2020 but late enough that the date provides the public sufficient advance notice. ICL recommends the virtual public hearing be set in August, mid-week, and after 5 PM Pacific Time.

To summarize, ICL respectfully requests the IPUC order a virtual public hearing be held on the matter of Avista's 2020 Electric IRP. Given the narrowing time window, ICL further requests that the IPUC order its Staff at the IPUC's earliest convenience to begin the process of coordinating a date and time to hold this virtual public hearing in August, mid-week, and after 5 PM Pacific Time.

Thank you for your time and consideration.

Very Respectfully,

Matt Nykiel

Conservation Associate

c: Diane Hanian, Commission Secretary, Idaho Public Utilities Commission Ed Jewell, Deputy Attorney General, Idaho Public Utilities Commission Shawn Bonfield, Sr. Manager, Regulatory Policy and Strategy, Avista David J. Meyer, Vice President and Chief Counsel for Regulatory and Governmental Affairs, Avista

1 ICL appreciates that the IPUC Staff are facilitating a virtual public workshop on July 9 for Avista's customers to learn more about the IRP, but we were disappointed to see the Staff set the virtual workshop for 3 PM Pacific Time. To actually enable robust public participation, it is critical that public workshops and hearings in North Idaho be set after 5 PM Pacific Time, when the majority of Avista customers are finished with work.